

FILED

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF VIRGINIA

2024 JAN -11 A 9:02

Ryan-Tyrone: Morris, in propia persona
333 Woodstream Boulevard
Stafford, VA 22556,

Plaintiff,

v.

UWM HOLDINGS CORPORATION
585 SOUTH BOULEVARD EAST
Pontiac, Michigan 48341,

Defendant.

PLEADING FOR SUMMARY JUDGMENT
\$1,712,757.98

1:24-cv-10-MSN-WEF

JURISDICTION AND VENUE

This court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 and 5 U.S.C. § 702.

The court has the authority to grant relief pursuant to the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202.

Venue is proper in this district pursuant to 28 U.S.C. § 1391(b).

CLAIMS

FIRST CLAIM FOR RELIEF:

VAC § 59.1-507.1 BREACH OF CONTRACT; MATERIAL BREACH

Defendant failed to provide proof of performance to contract.

Plaintiff was misled in believing a loan occurred and had to be repaid causing undue tension and stress in Plaintiff's personal and professional life.

SECOND CLAIM FOR RELIEF:

26 U.S.C. § 7201 ATTEMPT TO EVADE OR DEFEAT TAX

Defendant failed to provide proof of the alleged loan being transferred to the "Real Estate Mortgage Investment Conduit" (REMIC) within 90 days per the IRS tax code, which provides tax relief for the Defendant.

The failure to provide such proof would have Defendant be liable for the tax. However, Defendant has not proven that it has taken such responsibility.

1 **THIRD CLAIM FOR RELIEF:**

2 **18 U.S.C. § 1348 SECURITIES AND COMMODITIES FRAUD**

3 Defendant failed to inform Plaintiff of "securities account" created upon deposit of Plaintiff's security of
4 which, would receive interest for the benefit of Plaintiff. Defendant has not produced any endorsed loan documents
5 which would evidence ownership of the loan and all proceeds derived from it.

6 **FOURTH CLAIM FOR RELIEF:**

7 **15 U.S.C. § 1692E FALSE OR MISLEADING REPRESENTATIONS**

8 Failure to transfer loan to REMIC also forfeits the ability to label real property as "qualified mortgage".
9 Defendant has offered no verifiable proof that the alleged "loan" was made to Plaintiff.

10 **FIFTH CLAIM FOR RELIEF:**

11 **18 U.S.C. § 1028A AGGRAVATED IDENTITY THEFT**

12 Defendant failed to provide any contract, nor did it request permission to transfer nonpublic personal
13 information to any unaffiliated third party (TRANSUNION, EQUIFAX INC., EXPERIAN INFORMATION
14 SOLUTIONS INC).

15 **PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiff respectfully requests that the Court:

17 Declare Defendant's acquiescence as truth and award Plaintiff the value of the debenture (\$350,536), all
18 previous security interest (\$31,110.99) and hereinafter, and all submitted tender (\$31,110.99);

19 Permanently enjoin Defendant from pursuing any further action against Plaintiff;

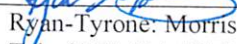
20 Award to Plaintiff all court fees incurred;

21 Award to Plaintiff fees from Fee Schedule (Instrument 230012408) for "Fraud", "Failure to provide signed
22 contracts by both parties", and "Failure to provide IRS tax forms" in the amount of \$1,300,000;

23 and

24 Order such other relief as the Court may deem just and proper.

25 Respectfully submitted this 4th day of January 2024.

26 
Ryan-Tyrone Morris
27 Tel: (443) 314-1216
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28

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria DIVISION

Ryan-Tyrone Morris PROPIA PERSONA
Plaintiff(s),

v.

Civil Action Number: _____

UWM HOLDINGS CORPORATION
Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of COMPLAINT
(Title of Document)

Ryan-Tyrone Morris
Name of Pro Se Party (Print or Type) PROPIA PERSONA

Ryan-Tyrone Morris
Signature of Pro Se Party PROPIA PERSONA

Executed on: 1/4/24 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: _____ (Date)